

1 THE HONORABLE JOHN H. CHUN
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 FEDERAL TRADE COMMISSION, *et al.*,

14 Plaintiffs,

v.

15 AMAZON.COM, INC., a corporation,

16 Defendant.

17 CASE NO.: 2:23-cv-01495-JHC

18 STIPULATED MOTION AND
19 [PROPOSED] ORDER TO FILE A
20 CORRECTED REDACTED COPY
21 OF EXHIBIT B

22 NOTE ON MOTION CALENDAR:
23 June 3, 2024

24 The parties, by and through their attorneys of record, respectfully request that the Court
enter the proposed order set forth below regarding Exhibit B to Plaintiffs' Motion to Compel
Production of Documents Related to Spoliation.

In support of this request, the parties represent the following to the Court:

1. On May 31, 2024, the Court ordered that Exhibit B should be publicly filed with
Plaintiffs' partial redactions of the document. (Dkt. #243).
2. The parties met and conferred on June 3, 2024. Amazon identified two additional
instances where names should be redacted, and Plaintiffs agree that those

1 redactions are appropriate. Both of the names in question were redacted
2 elsewhere in Plaintiffs' proposed redactions.

3. The parties stipulate as follows, subject to Court approval, and jointly request that
4 the Court enter the following Order approving this Stipulation.
5 a. Plaintiffs are directed to file a public version of Exhibit B consistent with
6 the Court's May 31, 2024 Order and the additional redactions described
7 above.

8 Stipulated to and respectfully submitted this 3rd day of June, 2024, by:

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11 s/ Kara King

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24 STIPULATED MOTION AND [PROPOSED]
ORDER TO FILE A CORRECTED REDACTED COPY OF
EXHIBIT B - 3
CASE NO. 2:23-cv-01495-JHC

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STIPULATED MOTION AND [PROPOSED]
ORDER TO FILE A CORRECTED REDACTED COPY OF
EXHIBIT B - 5
CASE NO. 2:23-cv-01495-JHC

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**STIPULATED MOTION AND [PROPOSED]
ORDER TO FILE A CORRECTED REDACTED COPY OF
EXHIBIT B - 6
CASE NO. 2:23-cv-01495-JHC**

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**STIPULATED MOTION AND [PROPOSED]
ORDER TO FILE A CORRECTED REDACTED COPY OF
EXHIBIT B - 7
CASE NO. 2:23-cv-01495-JHC**

FEDERAL TRADE COMMISSION
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1 [PROPOSED] ORDER
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IT IS SO ORDERED.

DATED this _____ day of _____, 2024.

4
5 JOHN H. CHUN
6 UNITED STATES DISTRICT JUDGE
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8 Presented By:
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12 EDWARD H. TAKASHIMA (DC Bar # 1001641)
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